

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

*Plaintiffs,*

vs.

GOOGLE LLC,

*Defendant.*

No: 1:23-cv-00108-LMB-JFA

**DEFENDANT GOOGLE LLC'S MOTION TO SEAL**

Pursuant to Local Civil Rule 5(C), Defendant Google LLC (“Google”), through its undersigned counsel, hereby respectfully moves this Court for an order granting Google’s motion to seal. Google seeks leave to file portions of its Proposed Findings of Fact and Conclusions of Law under seal. Consistent with the local rule and this Court’s Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled “UNDER SEAL.” The grounds for this motion are contained in the memorandum of law concurrently filed in support of this motion. A proposed order is attached for the Court’s convenience.

Dated: November 4, 2024

Respectfully submitted,

Eric Mahr (*pro hac vice*)  
Andrew Ewalt (*pro hac vice*)  
Tyler Garrett (VSB # 94759)  
FRESHFIELDS BRUCKHAUS  
DERINGER US LLP  
700 13th Street, NW, 10th Floor  
Washington, DC 20005  
Telephone: (202) 777-4500  
Facsimile: (202) 777-4555  
eric.mahr@freshfields.com

Justina K. Sessions (*pro hac vice*)  
FRESHFIELDS BRUCKHAUS  
DERINGER US LLP  
855 Main Street  
Redwood City, CA 94063  
Telephone: (650) 618-9250  
Fax: (650) 461-8276  
justina.sessions@freshfields.com

Daniel Bitton (*pro hac vice*)  
AXINN, VELTROP & HARKRIDER  
LLP  
55 2nd Street  
San Francisco, CA 94105  
Telephone: (415) 490-2000  
Facsimile: (415) 490-2001  
dbitton@axinn.com

Bradley Justus (VSB # 80533)  
AXINN, VELTROP & HARKRIDER  
LLP  
1901 L Street, NW  
Washington, DC 20036  
Telephone: (202) 912-4700  
Facsimile: (202) 912-4701  
bjustus@axinn.com

/s/ Craig C. Reilly  
Craig C. Reilly (VSB # 20942)  
THE LAW OFFICE OF  
CRAIG C. REILLY, ESQ:  
209 Madison Street, Suite 501  
Alexandria, VA 22314  
Telephone: (703) 549-5354  
Facsimile: (703) 549-5355  
craig.reilly@ccreillylaw.com

Karen L. Dunn (*pro hac vice*)  
Jeannie S. Rhee (*pro hac vice*)  
William A: Isaacson (*pro hac vice*)  
Amy J. Mauser (*pro hac vice*)  
Martha L. Goodman (*pro hac vice*)  
Bryon P. Becker (VSB #93384)  
Erica Spevack (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
2001 K Street, NW  
Washington, DC 20006-1047  
Telephone: (202) 223-7300  
Facsimile (202) 223-7420  
kdunn@paulweiss.com

Erin J. Morgan (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Telephone: (212) 373-3387  
Facsimile: (212) 492-0387  
ejmorgan@paulweiss.com

*Counsel for Defendant Google LLC*